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FCC Secretary  
Magalie Roman Sales  
Office of the Secretary  
Federal Communications Commission  
1919 "M" Street N.W.  
Room 222  
Washington, D.C. 20554

Reference: FCC WT Docket 98-143

Sir;

"In the matter of 1998 biennial Regulatory Review-- Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143. " I submit the following comments.

FCC Proposal: Reduce the number of license classes from six to four.

Comment: I feel this has been a long time coming. Phasing out the Novice and the Technician-Plus classes is a good idea. Entry level should be at the "No Code" Technician. The 5 WPM Technician-Plus license holders should be grandfathered to the General class license. I also feel that limited high-frequency worldwide privileges should start with the General class license and a 5 WPM code test. This could be similar to the Technician-Plus class that we now have.

FCC Proposal: Eliminate RACES licensing.

Comment: When engaging in RACES communications it should not be necessary to have a separate license or call sign. I was an ARES Emergency Coordinator, we had established a net with the cooperation of one of our local 2 meter repeaters. We could cover the entire Western North Carolina area. We worked very closely with our Emergency Management Coordinator. I feel that having a backup system such as the RACES Service will enhance our capabilities in community service, but we do not need to worry about each service having separate call signs.

FCC Proposal: Privatizing certain enforcement procedures.

Comment: The Ham radio community can police their own service to the extent of bringing to the attention of the FCC utilizing organizations such as the ARRL. These organizations should work closely with the local clubs to help bring complaints of interference to the Commission. These persons should bring complaints with evidence: such as tape recordings of on the air infractions. The complaints could include a draft order to show cause to initiate a revocation or cease-and-desist hearing proceeding. Of course legal counsel such as the ARRL has could use

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these opportunities to help put some teeth into ham enforcement. I hope this will encourage the FCC to come up with a better enforcement policy. We all can see a policy that is slipping toward nonexistent. The CB service is proof that this can get out of hand.

FCC Proposal: Reduce required Morse Code elements.

Comment: The three levels of 5 WPM, 13 WPM and 20 WPM do not remain relevant in today's communications. I feel that we should have a general class license that requires a 5 WPM code test and the test should contain "on the air" type communications. We should adopt a fill-in-the-blank question test on the written code copy, if the applicants copy code for five minutes and has one minute of understandable copy they should be given credit for the code test. Applicants who go to a Club/radio school and take the code test and pass it are demonstrating the real world of sending and receiving the code over the air. These students should also be given credit for the code when they produce a "signed off" certificate/credit voucher similar to the credit slip given at the VE test sessions. I feel that the 13 and 20 WPM code test should be replaced with a 10 WPM test that would be more in line with the International type of tests. This should also be an "on the air" type of test.

I agree with the ARRL suggestion of having the disabled examinee being required to attempt the higher-speed CW exam before there is action on their doctor's exam credit sheet. I feel the VEC should be authorized to require medical information from the certifying physician pertaining to the examinee's disability.

There should be required exam questions and the current question pool best reflects the challenge to demonstrate that the applicant is prepared to upgrade.

In summary: Phase out the Novice class and the Technician-Plus class license, with the Tech-plus grandfathered to General class. General class code test at 5 WPM, Advanced and Extra class code test at 10 WPM.

License Classes:

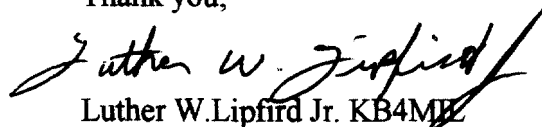
Technician: no code

General: 5 WPM code with Technician-Plus type HF privileges

Advanced: 10 WPM code with current privileges

Extra: 10 WPM code with all current privileges

Thank you;



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